

**STATE OF NEW MEXICO  
DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES  
OIL CONSERVATION DIVISION**

**APPLICATION OF MRC PERMIAN  
COMPANY FOR APPROVAL OF AN  
OVERLAPPING HORIZONTAL WELL SPACING  
UNIT AND COMPULSORY POOLING,  
LEA COUNTY, NEW MEXICO.**

**CASE NOS. 23621-23623**

**ENTRY OF APPEARANCE AND NOTICE OF OPPOSITION  
TO PRESENTATION BY AFFIDAVIT**

Modrall, Sperling, Roehl, Harris & Sisk, P.A., (Deana M. Bennett and Earl E. DeBrine, Jr.) hereby enters its appearance on behalf of Franklin Mountain Energy, LLC (“Franklin Mountain”) in the above-referenced cases.

Franklin Mountain further provides notice that it objects to presentation of these cases by affidavit under Rule 19.15.4.12(A)(1)(b).

Respectfully submitted,

MODRALL, SPERLING, ROEHL, HARRIS  
& SISK, P.A.

By: /s/ Deana M. Bennett  
Deana M. Bennett  
Earl E. DeBrine, Jr.  
Post Office Box 2168  
500 Fourth Street NW, Suite 1000  
Albuquerque, New Mexico 87103-2168  
Telephone: 505.848.1800  
[edebrine@modrall.com](mailto:edebrine@modrall.com)  
[dbennett@modrall.com](mailto:dbennett@modrall.com)

*Attorneys for Franklin Mountain Energy*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served on the following counsel of record by electronic mail on July 24, 2023:

Michael H. Feldewert  
Adam G. Rankin  
Julia Broggi  
Paula M. Vance  
HOLLAND & HART, LLP  
Post Office Box 2208  
Santa Fe, NM 87504-2208  
[mfeldewert@hollandhart.com](mailto:mfeldewert@hollandhart.com)  
[agrarkin@hollandhart.com](mailto:agrarkin@hollandhart.com)  
[jbroggi@hollandhart.com](mailto:jbroggi@hollandhart.com)  
[pmvance@hollandhart.com](mailto:pmvance@hollandhart.com)  
*Attorneys for MRC Permian Company*

MODRALL, SPERLING, ROEHL, HARRIS  
& SISK, P.A.

By: /s/ Deana M. Bennett  
Deana M. Bennett